

EXHIBIT 10

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

STATE OF MARYLAND; STATE OF DELAWARE;
STATE OF CALIFORNIA; STATE OF
COLORADO; STATE OF ARIZONA; STATE OF
CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAII; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy Beshear,
in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as Governor
of the COMMONWEALTH OF PENNSYLVANIA;
STATE OF RHODE ISLAND; STATE OF
VERMONT; STATE OF WASHINGTON; STATE
OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as AmeriCorps;
and JENNIFER BASTRESS TAHMASEBI, in her
official capacity as Interim Head of the Corporation
for National and Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

DECLARATION OF PAUL CALISTRO

Pursuant to 28 U.S.C. § 1746, I, Paul F. Calistro, Jr. hereby declare as follows:

1. I am a resident of the State of Delaware. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the West End Neighborhood House, as the Executive Director, and have been in this role for 34 years. I am the immediate past Chair of the Governor's Commission on Community and Volunteer Service, which among other duties provided oversight by volunteers of AmeriCorps, grant award monitoring, policies, and procedures.

3. As a former State Commissioner and current Executive Director of West End Neighborhood House, I have overseen the development of comprehensive statewide national service programs. This work included leading inclusive policy development, establishing state funding priorities, and selecting applicants for National Service programs. I also prepared Delaware applicants for national and community service grants, reviewed financial records to ensure proper stewardship of federal funds, and monitored sub grantee compliance to ensure high-quality, legally compliant programs throughout the state.

4. Currently, West End Neighborhood House administers the following AmeriCorps grants: Corporation for National and Community Service, AmeriCorps Fixed Amount Grant (State). The service areas impacted by these programs include the City of Wilmington and New Castle County, Delaware. Our organization has been approved to receive \$120,879 in funding to support 10 AmeriCorps members (8 Half-time, 1 MT, 1 QT) who provide essential services in the areas of school readiness, academic enrichment, higher education assistance, prevention education,

and community farming initiatives. Specifically, our Youth Department and Bright Spot Urban Farm have benefitted from their contributions, addressing critical needs such as educational support and local food access for low-income families.

5. On April 17, 2025, I was informed that a significant reduction in AmeriCorps staff—85%—had been placed on administrative leave, which has severely impacted the ability of the Delaware Commission to manage AmeriCorps grant programs. As a result, we are experiencing delays in the approval and disbursement of critical funding, including support for our own AmeriCorps program. This lack of timely support is jeopardizing West End Neighborhood House's ability to sustain its AmeriCorps-funded services, which include school readiness, mentoring, and community farming initiatives. Without these funds and guidance, our capacity to serve vulnerable populations in Wilmington and New Castle County is at serious risk. The loss of AmeriCorps staff and the resulting delays have created significant uncertainty for our programming. With the upcoming recruitment cycle and member placements in jeopardy, we are unable to effectively plan for the continuation of these essential services, further diminishing our ability to support the community.

6. On April 25, 2025, West End Neighborhood House received an unexpected termination notice from AmeriCorps, instructing us to immediately halt all grant-funded activities. This notice affected a formula grant totaling \$120,879, which was earmarked for 10 AmeriCorps members providing critical services in school readiness, mentoring, and community farming initiatives. The abrupt nature of this decision caused significant disruption, leaving us unable to continue vital programming or reassign members to other projects. The uncertainty surrounding this termination has created a severe operational crisis, as we now face the prospect of discontinuing services that support vulnerable populations in Wilmington and New Castle County.

7. The sudden termination of our AmeriCorps grants has caused considerable disruption at West End Neighborhood House. With little warning or opportunity to adjust, we now face significant challenges in maintaining the services that our programs provide. Many of our AmeriCorps members, who had committed a year of service, are left uncertain about their future. While some may secure alternative positions, for many, the AmeriCorps stipend was their primary income source. The situation is further exacerbated by existing budget constraints—West End has already experienced a 12% reduction in staff due to state and federal funding cuts. Without the grant funds, we are unable to reassign members to other roles or cover their costs. This abrupt loss has left us struggling to fulfill our commitment to the communities we serve, as we no longer have the resources to support critical programs that benefit vulnerable populations in Wilmington and New Castle County.

8. The termination of these AmeriCorps programs has had a profound impact on West End Neighborhood House, significantly disrupting our ability to serve the community.

a. **AmeriCorps Members:** The termination of our AmeriCorps program has affected 10 members, who were providing essential services in areas such as school readiness, mentoring, and community farming. These members were not eligible for COBRA or unemployment benefits, leaving them without income or healthcare support. The loss of their stipend—approximately \$12,000 per year—has created financial hardship, and all 10 members now require immediate financial assistance to meet basic needs, such as housing and food.

b. **Impact on Services:** The loss of these 10 AmeriCorps members has resulted in a dramatic reduction in our program's capacity to serve the community. West End will no longer be able to support approximately 400 children who were set to

receive educational remediation this summer, which will lead to significant learning losses and potentially exacerbate existing educational gaps. Additionally, our ability to provide local produce to low-income families and seniors through the Bright Spot Urban Farm has been severely diminished.

c. Loss of Community Programs: The loss of AmeriCorps members has resulted in the suspension of several critical community programs, including educational support, coaching, and food assistance. 10 AmeriCorps members were providing vital services, with 8 members working with youth in roles such as tutors, coaches, and camp counselors, and 2 members working on our farm program, growing food for low-income families and senior citizens. The 8 youth-focused members each committed to 900 hours of service. If we compare their tutoring work to the \$50 per hour rate typically charged by private tutoring companies, the total value of their tutoring alone would be approximately \$45,000 (equivalent to one external tutor working for 900 hours at that market rate). Given that these 8 members also served in other roles as coaches and camp counselors, their combined service is valued at more than \$360,000, considering the market rate for the breadth of their work. Additionally, the 2 farm program members were growing fresh produce to provide nutritious food to low-income families and senior citizens, a vital service now lost to the community. With the loss of these 10 AmeriCorps members, we are unable to provide these essential services to the 400 children and low-income families who depend on them. Parents who chose West End Neighborhood House for these opportunities will now need to find

alternatives for their children this summer, and vulnerable families lose access to the fresh produce that was essential to their well-being.

9. Lack of Communication and Staffing Impact: The ongoing lack of communication and staffing within AmeriCorps has placed the future of all Delaware-based AmeriCorps programs, including those at West End Neighborhood House, in significant jeopardy. As a result of these delays and the current staffing crisis, we are unable to rely on timely action from AmeriCorps to address critical funding and operational needs. Without clear and consistent guidance, the uncertainty surrounding the continuation of these programs is undermining our ability to plan for the future.

a. Drawdown Approval Delays: The remaining available funds for reimbursement this year, totaling over \$70,000 in grants, are at risk due to ongoing delays in the approval process. If these funds are not approved promptly, AmeriCorps members may lose their living stipends, with the potential to receive only a reduced percentage of their educational award. This creates a significant financial hardship for our members, who rely on these stipends to meet their basic needs while serving in these essential community roles.

b. Grant Review and Approval Delays: The allocation of 2025 Formula Grants is subject to delays in the review and approval process. According to AmeriCorps guidance, the State Commission is required to review applications from potential grantees—both those who were part of the competitive process and others—and submit recommendations for final approval by AmeriCorps no later than June. However, due to ongoing delays, there is significant uncertainty about when these grants will be approved. Without timely approval, we face the risk of a gap in

funding that could delay the start of essential programs, which are scheduled to begin in August and continue through July. These delays are further compounded by a lack of clarity surrounding the allocation of funds, which is essential for planning and staffing purposes.

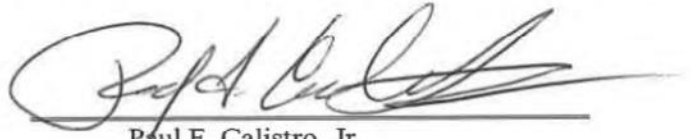
c. Delays and Impact on Recruitment: Delays in the review and approval of AmeriCorps grants severely undermine our ability to maintain and grow programs beyond upcoming recruitment cycles. As these delays persist, they are compounded by market instability and a growing reluctance among potential candidates to pursue positions in federally funded programs. Recent reductions in AmeriCorps staff and the unexpected termination of grants have led to a lack of clarity around future funding, making it difficult for us to plan effectively. As a result, we are unable to secure the necessary philanthropic support to meet match requirements. Our programs must begin advertising for member positions in June to ensure proper staffing and enrollment for August. However, the recent terminations of AmeriCorps members—including those in NCCC and VISTA programs—have led to a loss of confidence in the stability and reliability of AmeriCorps as a service opportunity. This perception is deterring prospective applicants, making it increasingly difficult to recruit the necessary members to sustain and deliver essential services in our communities.

d. National Service Trust Transaction Delays: Of the 10 AmeriCorps members currently serving with West End, at least 8 rely on the National Service Trust for post-service benefits, including tuition payments, student loan forbearance, and accrued interest payments. The abrupt termination of member

service, combined with a reduced federal workforce tasked with processing these transactions, is expected to cause significant delays in accessing these benefits. Such delays may result in financial hardship, including damaged credit or loan defaults, and may force some members to seek emergency support from state or charitable resources. The consequences extend beyond current members. The education award and living allowance are central incentives for individuals—especially those from low-income backgrounds—to participate in national service. Their removal undermines recruitment and makes AmeriCorps positions increasingly inaccessible to those who cannot afford to volunteer without compensation. Without these tools, West End would be forced to rely on unpaid volunteers or develop new paid roles to fulfill service functions—at a significantly higher cost. This shift is not financially sustainable and would reduce the scope and reach of our services.

10. The termination of AmeriCorps grants thus creates both immediate disruption and long-term damage to recruitment pipelines, personnel retention, and service delivery. Without a viable national service infrastructure, nonprofit and community-based organizations across Delaware will face steep operational setbacks, ultimately reducing their ability to serve vulnerable populations who depend on these programs.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on May 5, 2025, at New Castle, Delaware.

A handwritten signature in black ink, appearing to read "Paul F. Calistro, Jr.", written over a horizontal line.

Paul F. Calistro, Jr.
Executive Director
West End Neighborhood House